

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) No. 1:21-cr-10256-IT  
KINGSLEY R. CHIN, )  
ADITYA HUMAD, and )  
SPINEFRONTIER, INC., )  
Defendants )

**MOTION TO DISMISS SPECIFIC COUNTS OF THE INDICTMENT**

Pursuant to Fed. R. Crim. P. 48(a), the United States Attorney for the District of Massachusetts hereby moves to dismiss:

- (i) Counts 6 and 7 of the Indictment in this case, charging the defendants with violations of the Anti-Kickback Statute, 42 U.S.C. § 1320a-7b(b)(2), against defendants Kingsley R. Chin and Aditya Humad; and
  - (ii) Counts 1 through 7 (all counts) of the Indictment in this case against defendant SpineFrontier, Inc.

In support of this motion for dismissal, the government states that, while the charges were properly included in the Indictment, the dismissal of these charges is in the interests of justice and an efficient trial, and will simplify and streamline the presentation of evidence to the jury.

Dated: January 17, 2025

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

JOSHUA S. LEVY  
United States Attorney

/s/ Amanda P. M. Strachan  
AMANDA P. M. STRACHAN  
Chief, Criminal Division

/s/ Christopher Looney  
ABRAHAM R. GEORGE  
CHRISTOPHER LOONEY  
MACKENZIE QUEENIN  
Assistant U.S. Attorneys

**CERTIFICATE OF SERVICE**

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Christopher R. Looney  
Christopher R. Looney  
Assistant United States Attorney

Dated: January 17, 2025